

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HAYDEN RICHARDSON, Plaintiff, v. NORTHWESTERN UNIVERSITY, AMANDA DASILVA, HEATHER VAN HOEGARDEN OBERING, MICHAEL POLISKY, and PAMELA BONNEVIER, Defendants.	Case No.: 1:21-cv-00522 Honorable Edmond E. Chang Magistrate Judge Sheila M. Finnegan
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PLAINTIFF'S MOTION FOR LEAVE TO SUBSTITUTE COUNSEL

Pursuant to Local Rule 83.17 of the United States District Court for the Northern District of Illinois and Illinois Rule of Professional Conduct 1.16, Plaintiff, HAYDEN RICHARDSON, moves the Court for leave to withdraw the appearances of her current counsel, Andrew T. Miltenberg, Kara L. Gorycki, Gabrielle M. Vinci, Kristen Mohr, and Stuart Bernstein of Nesenoff & Miltenberg, LLP; Ryan J. Levitt of Benesch Friedlander Coplan & Aronoff LLP; and Damon M. Cheronis of Cheronis & Parente LLC, as attorneys for Plaintiff, and permit Patrick A. Salvi, II, Lance D. Northcutt, and Jennifer M. Cascio of Salvi, Schostok & Pritchard, P.C. to substitute in and file their appearances as primary counsel of record in the above-captioned matter.

In support of this Motion, Plaintiff states as follows:

1. The undersigned has reached out to defense counsel for Defendant PAMELA BONNEVIER and confirmed there is no objection to the instant motion; counsel for NORTHWESTERN UNIVERSITY and MICHAEL POLISKY are separately objecting to the instant motion.

2. On January 29, 2021, Damon M. Cheronis of Cheronis & Parente LLC filed an

Appearance to represent Plaintiff in the above-captioned matter. [Dkt. 3]. Appearances by Levitt, Miltenberg, Gorycki, Vinci, Mohr, and Bernstein followed.

3. It is Plaintiff's desire that Patrick A. Salvi, II, Lance D. Northcutt, Jennifer M. Cascio, and the law firm Salvi, Schostok & Pritchard, P.C. assume all responsibility for the representation of Plaintiff and that her current attorneys of record withdraw from this matter. Accordingly, Plaintiff has engaged Salvi, Schostok & Pritchard, P.C. to represent her in all pending and future matters regarding this current litigation. Attorneys Salvi, Northcutt, and Cascio have previously represented litigants in multiple matters in this District and in federal and state courts. Both Mr. Salvi and Mr. Northcutt are admitted to the Trial Bar in the Northern District of Illinois and will serve as lead counsel subject to leave of this Honorable Court.

4. Subject to being granted leave from this Court, Nesenoff & Miltenberg, LLP, Benesch Friedlander Coplan & Aronoff LLP, and Cheronis & Parente LLC will withdraw from representing the Plaintiff and Patrick A. Salvi, II, Lance D. Northcutt, and Jennifer M. Cascio of Salvi, Schostok & Pritchard, P.C. shall file their appearances.

5. The requested substitution of counsel will not result in prejudice to any party. Moving counsel is aware of the history and general procedural posture in this case and is committed to moving forward on the litigation with all deliberate speed upon leave of this Honorable Court.

WHEREFORE, Pursuant to Local Rule 83.17 of the United States District Court for the Northern District of Illinois and Illinois Rule of Professional Conduct 1.16, Plaintiff respectfully requests that this Honorable Court grant her Motion and that her current counsel, Andrew T. Miltenberg, Kara L. Gorycki, Gabrielle M. Vinci, Kristen Mohr, and Stuart Bernstein of Nesenoff & Miltenberg, LLP; Ryan J. Levitt of Benesch Friedlander Coplan & Aronoff LLP; and Damon

M. Cheronis of Cheronis & Parente LLC, be given leave to withdraw, and that Patrick A. Salvi, II, Lance D. Northcutt, and Jennifer M. Cascio of Salvi, Schostok & Pritchard, P.C. be granted leave to file their appearances as counsel of record in the above-captioned matter.

Dated: August 15, 2024

Respectfully Submitted,

SALVI, SCHOSTOK & PRITCHARD, P.C.

By: /s/ Lance D. Northcutt

One of the Attorneys for Plaintiff

Patrick A. Salvi, II (ARDC #: 6293686)

Lance D. Northcutt (ARDC #: 6278144)

Jennifer M. Cascio (ARDC #: 6325256)

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By: /s/ Stuart Bernstein

One of the Attorneys for Plaintiff

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Counsel for Plaintiff, Hayden Richardson

CERTIFICATE OF SERVICE

I, Kate Mathis, a non-attorney, hereby certify on August 15, 2024, that I caused a copy of the foregoing **PLAINTIFF'S MOTION TO SUBSTITUTE** to be served upon all counsel of record via the Court's CM/ECF system.

/s/ Kate Mathis

Kate Mathis

Assistant to Lance D. Northcutt